

**BellSouth Telecommunications, Inc.**  
**Legal Department**  
1600 Williams Street  
Suite 5200  
Columbia, SC 29201

**Patrick W. Turner**  
General Counsel-South Carolina

803 401 2900  
Fax 803 254 1731

patrick.turner@bellsouth.com

November 29, 2004

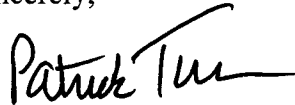
Public Service Commission of South Carolina  
Attention: Docketing Department  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region  
InterLATA Services Pursuant to Section 271 of the Telecommunications Act of  
1996  
Docket No. 2001-209-C

Dear Sir:

Enclosed for filing are the original and 10 copies of BellSouth Telecommunications, Inc.'s ("BellSouth's") performance data change Notification Reports for December 2004 and preliminary January 2005. These data change Notification Reports are being provided to inform the Commission of the changes BellSouth plans to make to its Performance Measures Analysis Platform ("PMAP") with December data, and previews the changes BellSouth is considering making for January data. A Data Disclosure Report for November 2004 would be filed at this time as well, if needed; however, for November 2004 there are no additional South Carolina validated data issues to be disclosed that affect performance measurement calculations for which a fix has not yet been scheduled.

Sincerely,



Patrick W. Turner

PWT/sgm  
Enclosure

cc: All Parties of Record  
PC Docs # 560436

## **PROPOSED DECEMBER 2004 DATA NOTIFICATION**

BellSouth proposes making the changes described in this document to generate results for the December 2004 data month. Results for the December 2004 data month will be posted as follows:

Preliminary results    January 20, 2005  
Final results            January 31, 2005

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

### **Ordering Measurements**

(1) *Affected Measures:* O-7, O-8 & O-11

*Description of Change:* Currently, when there is a Partially Mechanized FOC or Clarification in LNP for the same CC/PON/VER that was previously used on an LSR that resulted in a Fatal Reject, BellSouth is incorrectly counting the Fatal Reject as a Fully Mechanized Reject. The subsequent LSR and Response are also correctly counted as a Partially Mechanized FOC or Reject. BellSouth proposes to update the PMAP code to capture only the Partially Mechanized FOC or Reject because Fatal Rejects should not be reflected in the data, per the SQM. This proposed change was Item (1) on the Preliminary December Data Notification filed on October 1, 2004. (RQ5698)

*Impact of Change:* For June 2004, 6 Fully Mechanized LSRs that were fatally rejected in the region, were counted as Fully Mechanized Rejects for the Reject Interval Measure (O-8) and should not have been.

- (2) *Affected Measures:* O-8 & O-9

*Description of Change:* Effective August 2, 2004, per Carrier Notification Letter SN91084141, all remaining LSRs processed in the Atlanta LCSC were transitioned to the Birmingham LCSC. BellSouth proposes to make changes to the coding to reflect the hours of operation of the Birmingham LCSC. This proposed change was Item (2) on the Preliminary December Data Notification filed on October 1, 2004. (RQ5779)

*Impact of Change:* No LSRs were impacted by this change in the June 2004, data month.

### **Provisioning Measurements**

- (3) *Affected Measures:* P-7, P-7A & P-7B

*Description of Change:* Currently BellSouth uses Original Committed Due Date to determine the reporting period for these measures. BellSouth proposes to use the completion date to determine the reporting period consistent with the other Provisioning measures. This proposed change was Item (3) on the Preliminary December Data Notification filed on October 1, 2004. (RQ5621)

*Impact of Change:* For May 2004, in Florida, one less record would have been reported. This record would have been reported in June data.

- (4) *Affected Measures:* P-11 Mechanized (Florida, Georgia, Kentucky, and Tennessee)

*Description of Change:* With the implementation of the ENCORE Release 16.0, BellSouth discovered that changes in the tables caused some xDSL, UDC, UCL, and EELs orders to be erroneously omitted from this measure. BellSouth proposes correcting the code to include these Partially Mechanized orders. This proposed change was Item (4) on the Preliminary December Data Notification filed on October 1, 2004. (RQ5687)

*Impact of Change:* For June 2004, the result for the UNE disaggregation would have decreased by .016%.

- (5) *Affected Measures:* P-4A & P-4B (Georgia)

*Description of Change:* Currently, the SRS reports are displaying the incorrect retail analog for products of UNE 2W Loop Design, 2W Loop Design with INP and 2W Loop Design with LNP. The analog currently being displayed is Residence and Business Dispatch plus One Day. BellSouth proposes to display the correct analog of Residence and Business POTS plus One Day. This proposed change was Item (5) on the Preliminary December Data Notification filed on October 1, 2004. (RQ5717)

*Impact of Change:* For July 2004, in Georgia, the retail analog that would be displayed would change from 6.64 days to 6.47 days.

### **Billing Measurements**

- (6) *Affected Measures:* B-10

*Description of Change:* Currently, BellSouth reports data for this measure based on the month in which the dispute is resolved and divides this number into all responses sent in that month. This mismatch occasionally causes reported results to exceed 100%. BellSouth proposes to correct the code to use the month received as the month upon which the data is based. The received date will also be added to raw data. This proposed change was Item (6) on the Preliminary December Data Notification filed on October 1, 2004. (RQ5757)

*Impact of Change:* For July 2004, in Florida, 3 of 3965 records (.0007%) were incorrectly marked causing a 100.88% reported result for Resale.

### **Special Access Measurements**

- (7) *Affected Measures:* SA-3 (Tennessee)

*Description of Change:* Currently, on the Tennessee Aggregate Special Access Offered vs. Requested Due Date (Non-Distribution) Report, both the numerator and the denominator are being overstated by approximately equal amounts due to a programming error affecting this measurement. BellSouth proposes to implement changes in the coding to correct this problem. This proposed change was Item (7) on the Preliminary December Data Notification filed on October 1, 2004. (RQ5398)

*Impact of Change:* For June 2004, the percentage of the time BellSouth met the Requested Due Date for DS1 would change from 98.49% to 96.97%.

### **Other Measurements**

- (8) *Affected Measures:* TGP-1 & TGP-2

*Description of Change:* Currently, the Trunk Group Reports are produced manually. BellSouth proposes to mechanize the Trunk Group Reports in PMAP. This proposed change was Item (8) on the Preliminary December Data Notification filed on October 1, 2004. (RQ4857)

*Impact of Change:* No impact to data.

## **PRELIMINARY JANUARY 2005 DATA NOTIFICATION**

BellSouth is considering making the changes described in this document to generate results for the January 2005 data month. Results for the January 2005 data month will be posted as follows:

Preliminary results	February 21, 2005
Final results	February 28, 2005

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement ("SQM") Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

ENCORE Releases may affect monthly data flows from the source systems (e.g., LEO, LESOG, etc.) that PMAP uses to calculate measurements. Bellsouth will make changes to PMAP to ensure that data continues to be correctly captured as ENCORE Releases are implemented.

### **Pre-Ordering Measurements**

(1) *Affected Measures:* OSS-2 & OSS-3

*Description of Change:* Currently, there is a problem with the way the raw data is displayed for these measures. The records in the raw data are listed by instances of unique availability results instead of unique server. As an example for OSS-2 for the July data month and the BOCRIS/CRIS application, the twelve servers that have this application loaded were included in the report. Eleven of these servers had 100% availability and one of them had 99.97% availability. The raw data showed two records, one with 100% and one with 99.97%. The reports were correct and complete. BellSouth proposes to correct this problem to display all the servers in the raw data. (RQ5804)

*Impact of Change:* None to reported results.

### **Provisioning Measurements**

(2) *Affected Measures:* P-9

*Description of Change:* Currently, the Access Carrier Name Abbreviation (ACNA) codes in the supporting data files are being directly populated from the Service Order Fact table. BellSouth proposes to use the same lookup procedure utilized to populate the SQM Reports to more accurately assign the Service Order ownership for Local Interoffice Trunks in the supporting data files. (RQ5545)

*Impact of Change:* None to reported results.

(3) *Affected Measures:* P-4 & P-4A

*Description of Change:* Instead of using denial and restoral orders to manage customer non-payment situations, some CLECs issue an order for new service followed by a disconnect order for this purpose. Because service is already working at the location, the order for new service is a request for an additional line and is therefore identified as requiring dispatch of a technician to complete the order. BellSouth has been monitoring these orders, manually stopping the dispatch and assigning them an "L" appointment code because the now non-dispatch order has the longer dispatch installation interval due to the way the CLEC used this process. Bellsouth proposes to mechanize this "L" code assignment to avoid errors resulting from the manual process using the same criteria currently used to assign the code manually. (RQ5786)

*Impact of Change:* For May 2004, in Georgia, 328 orders would be excluded from the data. The interval for OCI would be reduced by 2.5 days.

(4) *Affected Measures:* P-13D (Florida, Georgia, Kentucky, Louisiana, North Carolina, and Tennessee)

*Description of Change:* Currently, one of the Non-Wireless LNP filters is inappropriately applied causing some ELMS6 submitted records to be excluded from this measure. BellSouth proposes to update the code to appropriately apply this filter to these records. (RQ5918)

*Impact of Change:* BellSouth continues to investigate the impact of the proposed change and will quantify this impact as soon as possible.

### **M&R Measurements**

- (5) *Affected Measures:* MR-1, MR-2, MR-3 & MR-4

*Description of Change:* Currently, the Operating Company Name (OCN) codes in the supporting data files are being directly populated from the Trouble Ticket tables. BellSouth proposes to use the same lookup procedure utilized to populate the SQM Reports to assign the ticket ownership in the supporting data files, as in the case of line splitting/line sharing (dual ownership). (RQ5523)

*Impact of Change:* None to the reported data.

- (6) *Affected Measures:* MR-2

*Description of Change:* Currently, PMAP uses the RESH code to identify the CLEC to which a line is assigned. The RESH code format for resold services should be an "R" followed by the CLECs Operating Company Name (OCN). In some cases, the character is not present on ISDN lines and the record is assigned to an error file because PMAP cannot identify the CLEC. BellSouth proposes to change PMAP to accept either an "R" or a blank as the first character in these situations so that the record will be assigned to the proper CLEC. (RQ5743)

*Impact of Change:* For August 2004, in the BellSouth Region, approximately 200 lines would be added to the resale ISDN line count which would account for a decrease in CTRR of .07%.

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

)  
)  
)

CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Proposed December 2004 Data Notification Report and Preliminary January 2005 Data Notification Report in Docket No. 2001-209-C to be served upon the following this November 29, 2004:

Elliott F. Elam, Jr., Esquire  
S. C. Department of Consumer Affairs  
3600 Forest Drive, 3<sup>rd</sup> Floor  
Post Office Box 5757  
Columbia, South Carolina 29250-5757  
(Consumer Advocate)  
**(U. S. Mail and Electronic Mail)**

Sonia Daniels  
Law & Government Affairs  
AT&T – Southern Region  
1200 Peachtree Street, NE, Rm. 4080  
Atlanta, Georgia 30309  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

Jocelyn G. Boyd, Esquire  
Staff Attorney  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(U. S. Mail and Electronic Mail)**

Russell B. Shetterly, Esquire  
P. O. Box 8207  
Columbia, South Carolina 29202  
(Knology of Charleston and Knology of  
South Carolina, Inc.)  
**(U. S. Mail and Electronic Mail)**

2004 NOV 29 11 26  
FBI - COLUMBIA



Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
1200 Main Street, 6th Floor  
Post Office Box 12399  
Columbia, South Carolina 29211  
(MCI WorldCom Network Service, Inc.  
MCI WorldCom Communications and  
MCImetro Access Transmission Services, Inc.)  
**(U. S. Mail and Electronic Mail)**

John F. Beach, Esquire  
John J. Pringle, Jr., Esquire  
Ellis Lawhorne & Sims, P.A.  
Post Office Box 2285  
Columbia, South Carolina 29202  
(Resort Hospitality Services, Inc., NuVox  
Communications, Inc., AIN and Momentum Business  
Solutions, Inc.)  
**(U. S. Mail and Electronic Mail)**

Marsha A. Ward, Esquire  
Kennard Woods, Esquire  
MCI WorldCom, Inc.  
Law and Public Policy  
6 Concourse Parkway, Suite 3200  
Atlanta, Georgia 30328  
(MCI)  
**(U. S. Mail and Electronic Mail)**

Frank R. Ellerbe, Esquire  
Bonnie D. Shealy, Esquire  
Robinson, McFadden & Moore, P.C.  
1901 Main Street, Suite 1200  
Post Office Box 944  
Columbia, South Carolina 29202  
(NewSouth Communications Corp., SCCTA and SECCA  
and KMC Telecom III, Inc.)  
**(U. S. Mail and Electronic Mail)**

Genevieve Morelli  
Andrew M. Klein  
Kelley, Drye & Warren, LLP  
1200 19<sup>th</sup> Street, N.W.  
Washington, D.C. 20036  
(KMC Telecom III, Inc.)  
**(U. S. Mail and Electronic Mail)**

John D. McLaughlin, Jr.  
Director, State Government Affairs  
KMC Telecom, Inc.  
1755 North Brown Road  
Lawrenceville, GA 30043  
(KMC Telecom)  
**(U. S. Mail and Electronic Mail)**

Jack Derrick  
Attorney  
141111 Capital Blvd.  
Wake Forest, NC 27587-5900  
(Sprint/United Telephone)  
**(U. S. Mail and Electronic Mail)**

Scott A. Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, South Carolina 29205  
(Sprint/United Telephone)  
**(U. S. Mail and Electronic Mail)**

Marty Bocock, Esquire  
Director of Regulatory Affairs  
1122 Lady Street, Suite 1050  
Columbia, South Carolina 29201  
(Sprint/United Telephone Company)  
**(U. S. Mail and Electronic Mail)**

Faye A. Flowers, Esquire  
Parker Poe Adams & Bernstein LLP  
1201 Main Street, Suite 1450  
Columbia, South Carolina 29202  
(US LEC)  
**(U. S. Mail and Electronic Mail)**

Andrew O. Isar  
Director – State Affairs  
7901 Skansie Avenue, Suite 240  
Gig Harbor, WA 98335  
(ASCENT)  
**(U. S. Mail and Electronic Mail)**

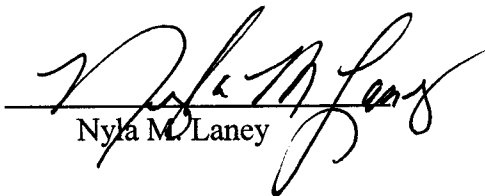
Nanette Edwards, Esquire  
ITC^DeltaCom Communications, Inc.  
4092 S. Memorial Parkway  
Huntsville, Alabama 25802  
**(U. S. Mail and Electronic Mail)**

Timothy Barber, Esquire  
Womble, Carlyle, Sandridge & Rice  
3300 One First Union Center  
301 South College  
Suite 3300  
Charlotte, North Carolina 20202  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

Tami Azorsky, Esquire  
McKenna & Cuneo, LLP  
1900 K Street, N.W.  
Washington, DC 20006  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

William Prescott, Esquire  
1200 Peachtree Street, N.E.  
Suite 8100  
Atlanta, Georgia 30309  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

John A. Doyle, Jr., Esquire  
Parker, Poe, Adams & Bernstein, L.L.P.  
150 Fayetteville Street Mall, Suite 1400  
Raleigh, North Carolina 27602  
(US LEC of South Carolina)  
**(U. S. Mail and Electronic Mail)**

  
Nyla M. Laney